


**U.S. Department of Justice**
*United States Attorney  
Eastern District of New York*

 CRH/JMH/EHS  
F. #2017R00906

 271 Cadman Plaza East  
Brooklyn, New York 11201

January 14, 2022

By Email, USAFx and FedEx

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Re: United States v. Michael McMahon  
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional materials, which are being produced in accordance with the government's discovery obligations:

| Description  | Begin Bates | End Bates |
|--|-------------|-----------|
| Media reports related to Operation Fox Hunt                    | MM-004292   | MM-004314 |
| Select records from previously produced search warrant returns | MM-004315   | MM-004470 |
| Facebook records and data                                      | MM-004471   | MM-004479 |
| Facebook records and data                                      | MM-005056   | MM-005056 |
| Facebook records and data                                      | MM-005057   | MM-005057 |

| <b>Description</b>                    | <b>Begin Bates</b> | <b>End Bates</b>        |
|---------------------------------------|--------------------|-------------------------|
| Capital One records                   | MM-004480          | MM-004658,<br>MM-005066 |
| TD Bank records                       | MM-004659          | MM—005055               |
| AT&T records                          | MM-005058          | MM-005058               |
| AT&T records                          | MM-005059          | MM-005059               |
| Locus records                         | MM-005060          | MM-005060               |
| Verizon records                       | MM-005061          | MM-005061               |
| Google records                        | MM-005062          | MM-005062               |
| Google records                        | MM-005063          | MM-005063               |
| Forensic report of mobile device      | MM-005064          | MM-005064               |
| Data from extraction of mobile device | MM-005065          | MM-005065               |

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers all of the materials produced today to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such materials accordingly. See Protective Order ¶¶ 7-9. The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Craig R. Heeren  
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Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)